

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

**SECURITIES AND EXCHANGE
COMMISSION,**

Plaintiff,

-against-

**MMOBUOSI ODOGWU BANYE (a/k/a DOZY
MMOBUOSI), TINGO GROUP, INC., AGRI-
FINTECH HOLDINGS, INC. (f/k/a TINGO
INC.), and TINGO INTERNATIONAL
HOLDINGS, INC.,**

Defendants,

1:23-cv-10928 (JMF)

NOTICE OF MOTION FOR DEFAULT JUDGMENT AGAINST DEFENDANTS

PLEASE TAKE NOTICE, that upon the accompanying memorandum of law, the accompanying Declarations of Michael DiBattista and Christopher Mele, and the exhibits attached thereto, Plaintiff Securities and Exchange Commission will move this Court, before Hon. Jesse M. Furman, at the federal courthouse located at 500 Pearl Street, New York, New York, 10007, on a date to be set by the Court, for an Order entering a default judgment against Defendants Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi), Tingo International Holdings, Inc., Agri-Fintech Holdings, Inc., and Tingo Group, Inc. pursuant to Federal Rules of Civil Procedure Rule 55(b)(2).

Dated: New York, New York
July 26, 2024

SECURITIES AND EXCHANGE COMMISSION

By: /s/ David Zetlin-Jones
David Zetlin-Jones
Michael DiBattista
New York Regional Office
100 Pearl Street, Suite 20-100
New York, NY 10004
(212) 336-0978 (Zetlin-Jones)
zetlinjonesj@sec.gov

LOCAL RULE 55.2(a)(3) CERTIFICATE

The undersigned certifies that on July 26, 2024, the foregoing Notice of Motion and Memorandum in Support, the Declarations of Christopher Mele and Michael DiBattista and exhibits appended thereto, the Proposed Final Judgment by Default, and all other documents filed in support of the foregoing request for default judgment, are being personally served upon (through counsel where known) and mailed to the following at their last known addresses or place of business:

Tingo Group, Inc.
28 West Grand Avenue, Suite 3
Montvale, NJ 07645

Tingo Group, Inc.
c/o Kenneth Denos, CEO
11650 South State Street, Suite 240
Draper, UT 14020
kdenos@denoslaw.com

Tingo Group, Inc.
c/o Robert Horowitz
Greenberg Traurig LLP
One Vanderbilt Ave.
New York, NY 10017
horowitzr@gtlaw.com

Agri-Fintech Holdings, Inc.
c/o Kenneth Denos, General Counsel
11650 South State Street, Suite 240
Draper, UT 14020
kdenos@denoslaw.com

Tingo International Holdings, Inc.
1 Stamford Plaza, 263 Tresser Blvd., 9th Floor
Stamford, CT 06901

Tingo International Holdings, Inc.
c/o Registered Agent: Connecticut Secretary of State
165 Capitol Ave.
Hartford, CT 06115

Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi)
64 Eccleston Square
London, United Kingdom, SW1V 1PH

Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi)
c/o Cameron Ashouripour, Esq.
Amsterdam & Partners, LLP
1054 31st St. NW, Suite 110
Washington, DC 20007
c.ashouripour@amsterdampartners.com

Mmobuosi Odogwu Banye (a/k/a Dozy Mmobuosi)
c/o Marc Agnifilo, Esq.
Agnifilo Intrater, LLP
445 Park Ave., 7th Floor
New York, NY 10022
marc@agilawgroup.com

Dated: New York, New York
July 26, 2024

By: /s/ David Zetlin-Jones

J. David Zetlin-Jones
Securities and Exchange Commission
New York Regional Office
100 Pearl Street
New York, NY 10004
(212) 336-0978
zetlinjonesj@sec.gov

Attorney for Plaintiff